

1 Nour Eddine ELASALI

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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY KULT DEPUTY

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8 United States District Court
9 Southern District of California
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11 Nour Eddine ELASALI

12 N.

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14 San Diego, Rich Illes, Scott
15 Melond, John Svets, Lorenzo
16 and Lori Ortiz, Does 1-100

CASE NO. 07 CV 2272 W JMA

First Amended

Complaint for Employment

Discrimination, Harrassment

Wrongful termination, interference
with civil rights

(Demand for jury trial)

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19 Plaintiff Nour Eddine ELASALI alleges:

20 1. Plaintiff is and was at all times mentioned herein
21 a citizen of the state of California.

22 2. Jurisdictional allegations: San Diego is a
23 corporation incorporated under the laws of California
24 having its principle place of business in California.
25 The jurisdiction of this court over this matter
26 is predicated on 28 USC §1332. The amount in controversy
27 exceeds \$ 50,000.00, exclusive of interest and costs.

28 3. Venue allegations: All defendants reside

1 in this district and also the claim arose
2 in this district.

3 4. Charging allegations: Plaintiff alleges
4 while working at San Diego Charters Co. Scott McCloud
5 and John Swets constantly harassed me and
6 discriminated against me by insulting me, calling
7 me names and making hate remarks about my religious
8 belief and national origin. They also continuously
9 interfered with my job. I asked them several times
10 to stop it and they refused. So I reported them to
11 Rich Illies the owner of the company three different
12 times which led to my wrongful termination.
13 Lorenzo and his wife Lori Ortiz has also interfered
14 with my civil rights by covering up for them
15 in illegal ways and encouraging them to
16 continue their illegal acts.

17 These illegal acts has caused me severe emotional
18 distress. Wherefore Plaintiff prays for judgment
19 against all defendants to include Punitive
20 damages, compensatory damages, assignment back to
21 previous job, any and all damages, rights that the
22 Court may find proper. Damages exceeds \$50,000.00
23 and has not been ascertained yet.

24 Plaintiff hereby demands a jury trial as provided by rule
25 38(a) of the federal rules of civil procedure.

26 Plaintiff also request that court allow my attorney to correct/adjust
27 the complaint if needed.

28 Date: 01-11-08

Nouredine ELIASLI
B. Elensli
Plaintiff, Pro Se.